

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF THE NEW
YORK TIMES COMPANY IN THE
MATTER OF UNITED STATES OF
AMERICA v. CHRISTOPHER WADE

No. 24 MC ____

HON PAUL G. GARDEPHE

NOTICE OF MOTION TO UNSEAL

PLEASE TAKE NOTICE that upon the attached Declaration of David McCraw, dated January 26, 2024, in support of the Motion to Unseal by The New York Times Company (“The Times”); the exhibits attached; and the accompanying Memorandum of Law in Support of The Times’s Motion to Unseal, undersigned counsel for The Times will move this Court on a date and time to be set by the Court for an order unsealing the judicial records at issue.

Dated: January 26, 2024

Respectfully submitted,

By: /s/ David McCraw
David McCraw
Legal Department
The New York Times Company
620 8th Avenue
New York, NY 10018
(212) 556-4031
mccraw@nytimes.com

Counsel for The New York Times Company